

From: [ANDERSON Jim M](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [MCCLINCY Matt](#); [LACEY David](#)
Cc: [Chip Humphrey/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#)
Subject: RE: Revised RPAC Letter
Date: 11/24/2008 05:17 PM

Eric,

Thanks again for giving us the opportunity to review EPA's draft letter. We appreciate you considering our 11/4 comments on the 1st draft of EPA's letter, & think you resolved a number of our comments. Dave L, Matt & I all reviewed the letter & overall it looks, but we still have some concerns. Before I list those concerns, I'll just say that this is an important letter that should go out without too much more delay.

- 1) Upland RI & SCE needed to support GW pathway assessment (2nd full paragraph, page 3)- In EPA's original draft letter, you stated that an upland RI & SCE are needed in order for EPA to determine if there are any in-water PH RI/FS data gaps associated with GW discharge from Rhone Poulenc. We objected to this statement in our 11/4 e-mail. In your recent revised letter you state that a complete upland RI & SCE are needed to evaluate GW discharges (as opposed to data gaps determination). We agree with that revised statement. However, in the last full paragraph of page 3 of the revised draft letter, EPA requests that SLLI submit the upland RI & SCE during the 1st quarter of 2009. This sounds like EPA is again saying the upland RI & SCE are needed for the identification of in-water data gaps. Again, we disagree.
- 2) Scope of work (1st full paragraph, page 3)- We're still unclear as to what EPA specifically sees as TZW data gaps & a SOW to fill those data gaps. We suggest that EPA/partners convene a mtg to discuss the existing data, develop a site-specific hydro/exposure CSM, identify specific data gaps, & then develop specific sampling objectives & a SOW. After this is done, then EPA should direct the LWG (or SLLI as an agent for the LWG) to develop a GW Pathway FSP.
- 3) Agency providing oversight (last page)- We understand some of the advantages of SLLI doing the in-water work as an agent of the LWG under DEQ's oversight include: SLLI's previous work & familiarity with the site/releases; EPA does not have a contractual agreement with SLLI; & the contemplated in-water work will support upland source control efforts. However, there are also disadvantages to this construct..., for example, DEQ does not have the authority EPA

has to waive necessary permits/steps needed for sampling (e.g., Corps permit, DSL agreement/permit, etc). Typos-

-1st bullet, page 1- DGZ, not "DGS".

-1st full paragraph, page 3- Drop the ",", at the end of the last sentence.

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-----Original Message-----

From: Blischke.Eric@epamail.epa.gov

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Sent: Friday, November 21, 2008 10:10 AM

To: MCCLINCY Matt; LACEY David; ANDERSON Jim M

Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov

Subject: Revised RPAC Letter

Attached is the revised RPAC letter. It goes to SLLI. It references the discussions we had with SLLI in 2007. Upon reflection, I believe we should use the GASCO model for this work. It seems to match the agreement we had in 2007 and the fact that the evaluation was sent to DEQ.

Please let me know your thoughts.

Thanks, Eric

(See attached file: RPACLetter112108.doc)